

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

POSTAL RATE AND FEE CHANGES
PURSUANT TO PUBLIC LAW 108-18

Docket No. R2005-1

OPPOSITION OF THE UNITED STATES POSTAL SERVICE TO MOTION TO
COMPEL OF DOUGLAS F. CARLSON REGARDING DFC/USPS-54
(June 24, 2005)

The United States Postal Service hereby responds in opposition to the
motion to compel a response to DFC/USPS-54, filed on June 16, 2005.

The interrogatory requests that the Postal Service:

provide the overall overnight, two-day, and three-day EXFC scores for mail not
destined to post office boxes.

At page 2 of his motion, Mr. Carlson asserts that the purpose of the interrogatory is to
confirm his impression that customers who rent post office boxes receive worse delivery
service than customers who receive mail at street addresses.

Mr. Carlson's quest for post office box numbers and non post office box numbers
is based upon a flawed assumption. He argues at page 2 of his motion that "[o]verall
EXFC scores are comprised of two types of mail: mail addressed to post office boxes
and mail not addressed to post office boxes." The fact is that IBM, the EXFC contractor
employs reporters who receive their mail by various delivery modes: post office box, city
carrier route street address, rural route address, etc. In selecting reporters, IBM makes
no effort to establish statistically representative subsets of First-Class Mail recipients by
mode of delivery. For instance, no effort is made to ensure that all performance clusters
tested include post office box addresses or that post office box addresses or business

addresses are included in proportion to their numbers among the known universe of delivery addresses. It just so happens that some EXFC reporters receive their mail at post office box addresses. And, IBM is able, with some effort, to aggregate the raw data for test pieces delivered to those addresses.

There is not uniformity in the distribution of delivery modes in the tested performance clusters and the EXFC sampling plan includes no effort to produce representative data by delivery mode. So, assuming, *arguendo*, that city carrier addresses represented fifty percent of mail delivery points, there is no effort on IBM's part to ensure that fifty percent of its reporters receive their mail at such addresses. Accordingly, there is no basis for extracting the raw data from delivery of test pieces to city carrier route addresses and trumpeting them as representative of deliveries to such addresses or comparing those data to that for deliveries to rural route addresses and making any conclusion other than that the numbers are either different or coincidentally identical.

While it is possible to compile raw EXFC data on the basis of whether the exit address was a post office box or a business address or a rural route address, EXFC is not designed to produce data representative of delivery times by delivery exit mode -- post office box, via rural route, or city route.¹ Any effort to use any subset or part of the aggregate EXFC data as independent of the whole is completely devoid of any

¹ The same is true for EXFC reporter addresses with house numbers that end with the number "7" or that have ZIP Codes that end with the number "3." Yes, it is true that one can drill down into the database and produce scores showing what the on-time percentage appears to be for such addresses, but there is no basis for projecting those scores to be representative of delivery to street addresses that begin with the number "7" or ZIP Codes that end with the number "3", since the sample is not designed to

statistical reliability. Thus, while the Postal Service has responded to an earlier data request for EXFC post office box delivery data, there is no statistically valid basis for concluding that those numbers are representative of post office box delivery in comparison to delivery by any other mode.

Raw numbers by type of delivery address can be extracted from the EXFC database and compiled with some considerable effort. The end result is numbers that, when they appear on a page, at best have some aesthetic appeal to postal data obsessionists. The Postal Service expects that it could pay IBM to compile the data for all of the "non post office box" delivery modes and have the task completed within two to three weeks, but in the end, there would be no grounds for claiming that the disaggregated data were representative on a "post office box vs. non post office box" basis.

Thus, contrary to Mr. Carlson's assertions, such data would be of no use in assessing the value of post office box service within the meaning of 39 U.S.C. § 3622(b)(2) and the cost and burden of their production greatly outweigh any value they would have in this proceeding. Accordingly, his motion should be denied.

ensure that the pool of reporters is representative of such delivery addresses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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